REMARKS

At the time the Office Action was mailed on March 5, 2007, claims 1-23 were pending.

Claims 1, 5, 11, 16, and 19 are currently amended.

Claim 2 is presently canceled.

Thus, claims 1 and 3-23 remain pending.

Applicants and their attorney thank the Examiner for accepting the previously-filed response and, as a result, withdrawing the objections to the abstract, drawings, specification, and claims.

Rejections under 35 U.S.C. § 103

Claims 1 and 6-10 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ayers, "AbiWord's Potential" (Ayers) in view of Rohr, "RE: Styles Again" (Rohr).

Applicants currently amend claim 1 to recite subject matter that applicants understand to be allowable as indicated in the Office Action at Page 21 and as explained below. Applicants submit that this amendment renders moot the rejection of claim 1. Correspondingly, because claims 6-10 depend from and apply additional limitations to claim 1, claims 6-10 are allowable for at least the same reasons for which claim 1 is allowable. Thus, applicants submit that the amendment to claim 1 also renders the rejection moot with regard to claims 6-10. Applicants respectfully submit that the rejection under 35 U.S.C. § 103(a) of claims 1 and 6-10 should be withdrawn, and that claims 1 and 6-10 are in condition for allowance.

Claims 2-4, 11-15, and 17-23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ayers in view of Rohr in further view of W3C, "XML Schema Part 0: Primer," W3C Recommendation, May 2, 2001.

Because claims 2-4 depend from and apply additional limitations to claim 1, claims 2-4 are allowable for at least the same reasons as the claim from which they depend, claim 1. Because claim 1 is currently amended to recite subject matter applicants understand to be allowable, claims 2-4 are allowable for at least the same reasons for which claim 1 is allowable. Thus, applicants submit that the amendment to claim 1 also renders the rejection moot with regard to claims 2-4. Applicants respectfully submit that the rejection under 35 U.S.C. § 103(a) of claims 2-4 should be withdrawn, and the claims 2-4 are in condition for allowance.

Applicants currently amend claim 11 to recite subject matter that applicants understand to be allowable as indicated in the Office Action at Page 21. Applicants submit that this amendment renders moot the rejection of claim 11. Correspondingly, because claims 12-15 and 17-18 depend from and apply additional limitations to claim 11, claims 12-15 and 17-18 are allowable for at least the same reasons for which claim 11 is allowable. Thus, applicants submit that the amendment to claim 11 also renders the rejection moot with regard to claims 12-14 and 17-18. Applicants respectfully submit that the rejection under 35 U.S.C. § 103(a) of claims 11-15 and 17-18 should be withdrawn, and that claims 11-15 and 17-18 are in condition for allowance.

Applicants also currently amend claim 19 to recite subject matter recited in dependent claims depending from claims 1 and 11 which applicants understand to constitute allowable subject matter. Thus, applicants submit that this amendment renders moot the rejection of claim

19. Also, because claims 20-23 depend from and apply additional limitations to claim 19, applicants submit that the amendment to claim 19 also renders moot the rejection with regard to claims 20-23. Applicants respectfully submit that the rejection under 35 U.S.C. § 103(a) of claims 19-23 should be withdrawn, and that claims 19-23 are in condition for allowance.

However, notwithstanding that the amendments render the rejections moot, applicants feel compelled to traverse the rejections. Applicants submit that the foregoing rejections fail to present a *prima facie* case of obviousness because neither of the combinations of references recites all of the limitations recited in the claims as required by the Manual of Patent Examining Procedure. *See* MPEP § 706.02(j) ("the prior art reference (or references when combined) must teach or suggest all the claim limitations"). Respectfully, Ayers fails to teach what the Office Action asserts it teaches, and the combinations using Ayers thus fail to teach all of the limitations recited in independent claims 1, 11, and 19.

Specifically, Ayers fails to teach all of the limitations of claims 1, 11, and 19 because Ayers fails to teach or suggest "an application document that has been generated by an application that uses *a file format that is specific to the application*." As expressly stated by the Office Action, Ayers teaches a system in which "An *.abw file [the standard file format of the word processor described by Ayers] *is written in XML and thus is also in ASCII format; the files can be read by any text editor*." (Ayers; Page 2, Paragraph 4, cited by the Office Action on Page 4; emphasis added). XML and ASCII are both data formats that are widely accepted standards; neither XML nor ASCII can thus be considered "a file format that is specific to the application" as recited by claims 1, 11, and 19. In fact, because Ayers expressly describes storing documents in these virtually universal standard file formats, Ayers teaches away from the

limitation of "an application using a file format that is specific to the application." Thus, Ayers does not support a *prima facie* case of obviousness as asserted by the Office Action.

Furthermore, respectfully, the Office Action must be incorrect in relying on Ayers native use of XML and ASCII formats as teaching "a file format specific to an application" when, at the same time, the Office Action also relies on Ayers as teaching "mapping the determined properties of the field into at least one of a markup language element . . . and storing the mapped properties of the field in the markup language document." (*See* Office Action, Page 6). If one were to accept that XML was Ayers's "file format specific to an application," at the same time Ayers cannot possibly teach mapping that format into a markup language element and storing it in a markup language document, because Ayers's documents already are in a markup language format. To read Ayers to teach disparate elements does not give effect to the limitations recited in claims 1, 11, and 19. Thus, applicants respectfully submit that the Office Action fails to present a *prima facie* case of obviousness. As a result of the amendments described below and the shortcomings of Ayers, applicants request that the rejection under 35 U.S.C. § 103 be withdrawn against all of the pending claims.

Allowable Subject Matter

Claims 5 and 16 were objected to as being dependent upon a rejected base claim. However, the Office Action indicates the claims would be allowable if rewritten in independent form including the limitations of the base claim and any intervening claims from which each depends. Applicants hereby amend claim 1 to recite what applicants understand to be the allowable subject matter recited in claim the limitations of allowable claim 5 as well as the

limitations of claim 2 (from which claim 5 depends). Applicants also hereby amend claim 11 to recite what applicants understand to be the allowable subject matter recited in claim 16. Finally, applicants also amend claim 19 to recite limitations corresponding to those now included in claims 1 and 11. Applicants respectfully request that each of the independent claims now recite allowable subject matter and, thus, are in condition for allowance.

Applicants wish to clarify what they mean by "recite what applicants understand to be the allowable subject matter." Specifically, claim 5 and claim 16 both recite the following substantive limitation:

> [F]urther comprising representing the field with a fldSimple element when the field is determined to be a simple field.

Without wanting to put words in the Examiner's mouth, applicants believe that the Examiner's allowance of claims 5 and 16 is premised on the fact that, when the field is determined to be a simple field, the field is designated with a markup language element that indicates the field is a simple field. In other words, applicants submit that the allowance of claims 5 and 16 does not turn specifically on the syntax "fldSimple" being selected as the designation of the simple field markup language element. Respectfully, applicants believe that the Office Action would not find the claim to be allowable based on a syntax choice if the same subject matter were disclosed by the cited references. None of the cited references, or any prior art of which applicants are aware, discloses such a use of a simple field markup language element. Thus, applicants respectfully submit that claims 5 and 6 are allowable because a simple field markup language element is used to designate a field determined to be a simple field, not because of what that element is named.

Applicants have amended the independent claims to recite the subject matter understood to be allowable. Claim 1 as amended, is reproduced below as an example:

1.   (Currently Amended) A method for representing field structures in a markup language document, comprising:
inputting an application document that has been generated by an application that uses a file format that is specific to the application, wherein the file format is in a format that is native to the application and the file format comprises unique properties for describing fields within the document, wherein the unique properties are defined by the application;
determining one or more unique properties corresponding to a field that relates to at least one section of the application document;
determining whether the field is a complex field or a simple field;
mapping the determined properties of the field into at least one of a markup language element, an attribute, and /or a value, wherein the field is designated with a simple field markup language element when the field is determined to be a simple field; and
storing the mapped properties of the field in the markup language document whereby applications different from the application can understand the mapped field properties stored in the markup language document.

Applicants respectfully submit that claim 1 as amended recites the allowable subject matter previously recited in claim 5 (and in claim 2 from which claim 5 previously depended). Claim 2 is canceled, and claim 5 is amended to clarify that the simple field markup language element includes "fldSimple." Thus, applicants submit that claim 1, as well as claims 3-10 which depend from claim 1, are in condition for allowance.

In addition, applicants also have amended claim 11 to recite the allowable subject matter previously recited in claim 16. Claim 16 is amended to clarify that the simple field markup language element includes "fldSimple." Thus, applicants submit that claim 11, as well as claims 12-18 which depend from claim 11, are in condition for allowance.

Finally, applicants also have amended claim 19 to recite the allowable subject matter. Thus, applicants submit that claims 19-23 also are in condition for allowance.

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CONCLUSION

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicants at the telephone number provided below.

Respectfully submitted,

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